

Blockquarry Corp. f/k/a ISW Holdings, Inc.,)	Civil Action No. 7:23-cv-01427-TMC
)	
Plaintiff,)	
)	
v.)	
)	DEFENDANT/COUNTERCLAIMANT/
Litchain Corp. and Gaffney Board of Public)	CROSSCLAIMANT GAFFNEY
Works,)	BOARD OF PUBLIC WORKS’
)	MOTION TO ALTER TIME FOR
Defendants.)	RESPONDING TO PLAINTIFF’S
)	MOTION FOR PRELIMINARY
)	INJUNCTION
Gaffney Board of Public Works,)	
)	
Defendant/Counter and)	
Cross Claimant,)	
v.)	
)	
Blockquarry Corp. f/k/a ISW Holdings, Inc.,)	
)	
Counterclaim Defendant,)	
and)	
)	
Litchain Corp.,)	
)	
Crossclaim Defendant.)	
)	

Comes now Defendant/Counterclaimant/Crossclaimant, Gaffney Board of Public Works, South Carolina (“Gaffney BPW”), by and through undersigned counsel of record, and pursuant to Rule 6 of the Federal Rules of Civil Procedure and Local Civ. Rule 6.01 (D.S.C.), files this Motion to Alter Time for Responding to Plaintiff’s Motion for Preliminary Injunction so that the response attached as Exhibit 1, which includes the supporting Affidavit of Donnie L. Hardin as an exhibit, can be filed with the Court. The current deadline passed on April 25, 2023, has not been previously extended, and approximately twenty-nine additional days for responding is

effectively being sought (an extension of the deadline until May 23, 2023, or within twenty-four hours of an order granting this Motion). As further addressed in the accompanying memorandum of law, the requested extension will not affect other deadlines. In support of its request, Gaffney BPW relies upon this Motion, the Affidavit of Virginia P. Bozeman, the accompanying memorandum of law, and all supporting rules, statutes, and case law.

Pursuant to Local Civ. Rule 7.02 (D.S.C.), counsel for Gaffney BPW consulted with counsel for Blockquarry Corp. f/k/a ISW Holdings, Inc. (“Blockquarry”) in advance of filing this Motion, and Blockquarry consents to the relief sought herein. Blockquarry, however, reserves the right to file a reply in accordance with Local Civ. Rule 7.07 (D.S.C.) and has informed Gaffney BPW it intends to reply.

WHEREFORE, Gaffney BPW respectfully requests that this Court grant its motion and issue an order extending the deadline for responding to Plaintiff’s Motion for Preliminary Injunction (ECF No. 7) such that the Response of Defendant/Counterclaimant/Crossclaimant, Gaffney Board of Public Works, to Plaintiff’s Motion for Preliminary Injunction is accepted for filing as of the date of the filing of this Motion or can be formally filed within twenty-four hours of the entrance of an order granting this Motion.

Respectfully submitted,

POPE FLYNN, LLC

May 23, 2023

By: /s/ Virginia P. Bozeman

Virginia P. Bozeman (Fed. Bar No. 13476)

Lawrence E. Flynn III (Fed. Bar No. 14000)

1411 Gervais Street, Suite 300

Columbia, SC 29201

Phone: (803) 354-4900

Fax: (803) 354-4899

gbozeman@popeflynn.com

lflynn@popeflynn.com

ATTORNEYS FOR GAFFNEY BPW

CERTIFICATE OF SERVICE

The undersigned hereby certifies this Motion was served on Plaintiff, Blockquarry Corp. f/k/a ISW Holdings, Inc., on May 23, 2023, via the Court's electronic filing system and on Defendant, Litchain Corp., via U.S. Mail, postage prepaid, the same date, at the below last known address:

Litchain Corp.
Attn: Tony Tate
118 1/2 Willis Plaza
Gaffney, SC 29340

/s/ Virginia P. Bozeman